



January 28, 2009

Reply to Attn of: CC-A

TO: Distribution

FROM: CC/Chief Counsel

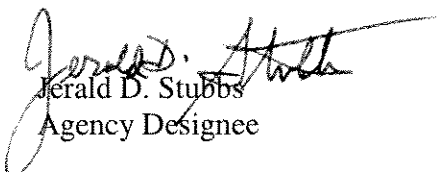
SUBJECT: Attendance at the STS-119 Pre-Launch Reception Sponsored by Delaware North Corp. Parks & Resorts, February 10, 2009

On February 10, 2009, Delaware North Corp. Parks & Resorts (DNC) will host a pre-launch reception in anticipation of the STS-119 launch. The event will be held at the Kennedy Space Center Visitors Complex Debus Conference Center, from 5:00 pm to 7:00 pm. Approximately 170 guests are expected to attend. These guests include a wide range of representatives that include industry leaders, NASA senior management, state and local elected officials, KSC contractor leaders, and NASA employees. The approximate value of the reception is \$30 per person.

I find this event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g). I further determine that there is an Agency interest in having NASA personnel attend the event. This event will allow NASA employees to discuss the NASA Vision for Space Exploration, the Space Shuttle program, and the STS-119 mission with the other attendees. In addition, this event is a forum for the attendees to disseminate information on NASA's ongoing activities and to discuss matters of interest to NASA with a diverse group. Accordingly, NASA employees whose duties do not substantially affect DNC may accept an invitation for complimentary attendance at the event.

NASA employees whose duties may substantially affect DNC, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from the Chief Counsel's Office.

In addition, DNC will provide a commemorative crystal shuttle valued at less than \$10.00 each to the attendees. Attendees are reminded of the \$20 gift exception at 5 C.F.R. § 2635.204(a), which provides that employees may accept gifts valued at no more than \$20 per occasion. Accordingly, in addition to accepting free attendance at the event, NASA employees may accept the crystal shuttle. NASA invitees are reminded not to exceed the \$50 cap on gifts from one source in a calendar year.


Gerald D. Stubbs
Agency Designee